

CALIFORNIA COASTAL COMMISSION

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July 7, 2003

California Energy Commission
Dockets Unit, Attn: Docket #02-IEP-01
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

VIA ELECTRONIC MAIL

RE: Comments on Draft 2003 Environmental Performance Report

Dear Commissioners:

Thank you for the opportunity to comment on the above-referenced document. We appreciate the effort and analysis your staff has put into the report. Due to workload demands and time constraints, we will not be able to participate in the July 8th hearing you have scheduled to hear comments on the report, but we are providing the comments below for your consideration. We focused our brief review on the issues related to once-through cooling at coastal power plants, which is one of the elements of power plant operations of most concern to the Coastal Commission, due to its often significant adverse effects on marine biological resources.

General Comments:

- Recent Coastal Commission Findings: Please add the following language to the existing text in several parts of the report (including page *iv*, under "Once-Through Cooling Impacts"; page *v*, under bullet two of "Water Quality"; and, page 54, under "Once – Through Cooling Impacts"):

“Recent and anticipated changes in U.S. EPA rules may require these systems to be substantially modified or replaced to reduce their effects on marine organisms. Additionally, in several recent reviews of proposed upgrades of coastal power plants, the California Coastal Commission has determined that continued use of the once-through cooling systems does not conform to Coastal Act policies.”

- Emerging Issue of Locating Desalination Facilities at Coastal Power Plants: We recommend adding a section to the report that discusses the increasing interest in locating desalination facilities at coastal power plants that use once-through cooling. Desalination proponents have identified a number of advantages to co-location, including access to the seawater and existing intakes and outfalls used by the power plant, the potential to obtain electricity from “inside the fence” at power plants at perhaps cheaper rates, and the benefit of having cooling water to dilute the brine discharge from the desalination facility. A number of parties have also identified concerns about whether such co-location would extend the life of once-through cooling systems that would otherwise be replaced with more environmentally appropriate systems, such as dry cooling, wet-dry cooling, or others. We recommend that the report add a section evaluating this co-

location issue, perhaps in coordination with the desalination task force work being done by the Department of Water Resources (information on this task force is available at <http://www.owue.water.ca.gov/recycle/desal/desal.cfm>).

Specific Comments:

- Page 54, Key Biological Resources Needs, bullet two – please add the following: “Identifying critical information and studies needed by the Energy Commission and other agencies early in the review process to assess the effects of electric generation projects on biological resources...”
- Page 55, first bullet at top of page – please add the following: “The continued use of once-through cooling at six coastal and estuarine plant sites that are being repowered will perpetuate adverse and significant impacts to the marine environment.”
- Page 61, first paragraph, line 9 – please make the following changes: “~~Only one project did not complete an impingement/entrainment study (Table III-4).~~ The Commission has not yet determined whether an impingement/entrainment study will be required for the proposed El Segundo Redevelopment Project.”
- Page 62, new paragraph after third line on page:

“Water use for coastal power plants is also administered by the California Coastal Commission. The California Coastal Act includes policies requiring maintenance, enhancement, and restoration of marine organisms, and minimization of the adverse effects associated with entrainment. For upgrades to power plants of 50 MW or greater, the CEC review must incorporate the findings and recommendations of the Coastal Commission unless the CEC determines they are infeasible or would cause greater adverse environmental harm. For power plant changes of less than 50 MW, the Coastal Commission retains independent review and permit authority.”
- Page 84, “Key Water Permitting Issues for New Power Plants”, bullet 3 – please add the following: “Assess and mitigate long-term impacts to aquatic ecosystems in marine and estuarine environments resulting from the use of once-through cooling by power plants in the coastal zones, including consideration of cooling systems that use less water (such as dry cooling, wet-dry cooling, etc.) where feasible.”
- Page 98: Please add a brief discussion of the Coastal Act and the Coastal Commission, similar to the Page 62 comment above.

Again, thank you for the opportunity to comment. If you or your staff has questions, please feel free to contact me at (415) 904-5248 or tluster@coastal.ca.gov.

Sincerely,

Tom Luster
Energy and Ocean Resources Unit